

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

**SUPPRESSED
FILED**

MAR -2 2022

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WAYNE D. LOZIER, Jr., and,
JODY L/ SULLIVAN,

Defendants.

No. S1-4:21 CR 365 RLW JMB

SUPERSEDING INDICTMENT

COUNT ONE
(Conspiracy to Kidnap)

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, up to and including May 9, 2019, within the Eastern District of Missouri and elsewhere,

WAYNE D. LOZIER, Jr.
and
JODY L. SULLIVAN,

the Defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully conspire to unlawfully seize, detain, carry away, and hold R.H., without his/her consent, for a reward, and to transport R.H. in interstate commerce, and at least one of the Defendants committed an overt act to effect the object of the conspiracy.

In violation of Title 18, United States Code, Section 1201(a).

OVERT ACTS

In furtherance of said conspiracy and to achieve the objectives and purposes thereof, the Defendants and other persons known and unknown to the Grand Jury committed and caused the commission of the following overt acts in the Eastern District of Missouri and elsewhere:

1. On or about May 9, 2019, Defendants Wayne Lozier, Jr. and Jody Sullivan unlawfully seized R.H. from a residence in St. Peters, Missouri, placed him/her in handcuffs, and carried him/her away in a vehicle.

2. On or about May 9, 2019, Defendants Wayne Lozier, Jr. and Jody Sullivan transported R.H. in a vehicle from Missouri to Mississippi while R.H. was in handcuffs.

COUNT TWO
(Kidnapping)

The Grand Jury further charges that:

On or about May 9, 2019, within the Eastern District of Missouri and elsewhere,

WAYNE D. LOZIER, Jr.
and
JODY L. SULLIVAN,

the Defendants herein, did unlawfully seize, detain, carry away, and hold R.H., without his/her consent, for a reward, and voluntarily and intentionally transported R.H. in interstate commerce, and in committing or in furtherance of the commission of the offense, used means, facilities, or instrumentalities of interstate commerce.

In violation of Title 18, United States Code, Section 1201(a).

A TRUE BILL

FOREPERSON

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